

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

IN RE GOOGLE INC. COOKIE
PLACEMENT CONSUMER PRIVACY
LITIGATION

C.A. 12-MD-2358 (SLR)

This Document Relates to:
All Actions

**STIPULATION AND [PROPOSED] ORDER RE:
DEADLINES FOR OPPOSITION AND REPLY BRIEFS FOR MOTIONS TO DISMISS**

WHEREAS, this multidistrict litigation consists of 24 consolidated class actions assigned to this Court by the Judicial Panel on Multidistrict Litigation (“JPML”);

WHEREAS, Plaintiffs filed a consolidated amended complaint (“CAC”) on December 19, 2012 on behalf of a putative nationwide class of plaintiffs against defendants Google Inc. (“Google”), PointRoll, Inc. (“PointRoll”), Vibrant Media, Inc., Media Innovation Group, LLC, and WPP, plc;

WHEREAS, Google and PointRoll filed separate motions to dismiss the CAC on January 22, 2013;

WHEREAS, pursuant to two separate stipulated orders entered by the Court on January 9, 2013 and on January 28, 2013, Plaintiffs’ opposition to Google’s and PointRoll’s motions to dismiss were due by February 26, 2013 and replies were due by March 19, 2013;

WHEREAS, on January 30, 2013, the Court stayed the case, including the briefing schedule on Google’s and PointRoll’s motions to dismiss, in light of a pending conditional

transfer order entered by the JPML with respect to potential tag-along actions pending in the Eastern District of New York;

WHEREAS, the Court lifted the stay as to Google's and PointRoll's motions to dismiss on February 27, 2013, setting deadlines of March 22, 2013 for Plaintiffs' oppositions and April 12, 2013 for Google's and PointRoll's replies;

WHEREAS, Google and PointRoll requested Plaintiffs' agreement to an additional week to file defendants' respective reply briefs because the time period set by the Court's February 27, 2013 order for preparing the reply briefs includes both Easter (March 31) and Passover (March 25 to April 2); and

WHEREAS, counsel for Plaintiffs agreed to stipulate to the one-week extension requested by Google and PointRoll on the condition that Plaintiffs also receive a one-week extension of their deadline to file an opposition brief due to vacation schedules of plaintiffs counsel, making the oppositions due March 29, 2013 and the replies due April 26, 2013;

THEREFORE, IT IS STIPULATED AND AGREED by the undersigned parties, through their respective counsel of record, subject to approval by the Court, that:

The briefing schedule for Google's and PointRoll's motions to dismiss shall be modified so that Plaintiffs' oppositions to those motions shall be due no later than March 29, 2013 and both Google's and PointRoll's replies shall be due no later than April 26, 2013.

IT IS SO STIPULATED.

Dated: March 14, 2013

/s/ Brian Russell Strange
Brian Russell Strange
Strange & Carpenter
12100 Wilshire Boulevard, Suite 1900
Los Angeles, CA 90025
310-207-5055
Email: lacounsel@earthlink.net

/s/ Stephen G. Grygiel
Stephen G. Grygiel (DE Bar No. 4944)
Keefe Bartels
170 Monmouth Street
Red Bank, NJ 07701
732-224-9400
Email: sgrygiel@keefebartels.com

/s/ James Frickleton
James Frickleton
Bartimus, Frickleton, Robertson & Gorny-Leawood
11150 Overbrook Road, Suite 200
Leawood, KS 66211
913-266-2300
Email: jimf@bflawfirm.com

Interim Lead Counsel for the Putative Plaintiff Class

/s/ Michael H. Rubin
Michael H. Rubin, CA Bar No. 214636
Anthony J Weibell, CA Bar No. 238850
Scott Andrews, CA Bar No. 243690
Wilson Sonsini Goodrich & Rosati
One Market Plaza
Spear Tower, Suite 3300
San Francisco, CA 94105-1126
415-947-2000
Email: mrubin@wsgr.com;
aweibell@wsgr.com; sandrews@wsgr.com

Counsel for Defendant Google Inc.

/s/ Alan Charles Raul
Alan Charles Raul
Edward R. McNicholas
Sidley Austin LLP
1501 K Street, N.W.
Washington, DC 20005
202-736-8000
Email: araul@sidley.com
emcnicholas@sidley.com

/s/ Susan M. Coletti
Susan M. Coletti, DE Bar No. 4690
Fish & Richardson P.C.
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899-1114
302-652-5070
Email: coletti@fr.com

Counsel for Defendant PointRoll, Inc.

Counsel for Defendant PointRoll, Inc.

SO ORDERED on this _____ day of March, 2013.

Hon. Sue L. Robinson
United States District Judge